



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

DAVID S. THAYER
Assistant Corporation Counsel
t: (212) 356-2649
f: (212) 356-1148
e: dthayer@law.nyc.gov

September 4, 2024

The Honorable Jennifer L. Rochon
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: M.N., et al. v. N.Y.C. Dep't of Educ., No. 24 CV 62⁸~~93~~ (JLR)

Dear Judge Rochon:

I am an Assistant Corporation Counsel in the office of the Acting Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for the Defendant New York City Department of Education ("DOE") in the above-referenced action. With the consent of Plaintiffs' counsel, I write to respectfully request a three-week extension of the parties' deadline to submit a joint letter as ordered by the Court on August 22, 2024, as well as a three-week extension of DOE's deadline to respond to the Complaint.

I was only just assigned to handle this matter after returning from a vacation and as such am still investigating the allegations set forth in the Complaint, of which I have only been able to conduct an initial review and concerning which I have not yet had any meaningful discussion with my colleagues at the DOE. The requested extension will therefore provide additional time to conduct this preliminary investigation into the Complaint's allegations so that I am able to provide the Court with an appropriate response to the Complaint, as well as participate in a productive discussion with Plaintiffs' counsel in advance of filing a joint letter about whether there is a need for discovery or about the appropriate amount of time to file cross motions for summary judgment.

The requested extension would move the parties' deadline to provide the Court with a joint letter from September 5, 2024, to September 26, 2024. The requested extension would move DOE's deadline to respond to the Complaint from September 12, 2024, to October 3, 2024. This is the DOE's first request for an extension of either deadline. As noted, Plaintiffs' counsel has graciously consented to this request.

Lastly, I apologize to the Court that this application is made within forty-eight hours of one of the deadlines DOE requests to be extended, in contravention of the Court's Individual Rules. This is due to the timing of my recent assignment to this action, and I apologize for any inconvenience this belated application may have caused to the Court or to Plaintiffs as a result.

I thank the Court for its consideration of this application.

Respectfully yours,

/s/ David S. Thayer


David S. Thayer

cc: *Via ECF*
All counsel of record

The requested extensions of time to submit a joint letter by **September 26, 2024**, and to respond to the Complaint by **October 3, 2024**, are GRANTED.

Dated: September 5, 2024
New York, New York

SO ORDERED.



JENNIFER L. ROCHON
United States District Judge